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Attorney for Defendant  
REGINALD THOMAS

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,  
  
Plaintiff,

v.

REGINALD THOMAS,  
  
Defendant.

Case No.: 2:20-CR-00012 JAM

**STIPULATION AND ORDER  
CONTINUING STATUS CONFERENCE**

**STIPULATION**

Defendant Reginald Thomas, by and through his undersigned counsel, and Plaintiff United States of America, by and through its counsel of record, hereby stipulate and request that the Status Conference previously set for December 14, 2021 be continued to January 18, 2022 at 9:30am. The defendant further agrees to waive time under the Speedy Trial Act pursuant to Local Code T4, defense preparation, up to and through the January 18, 2022 date.

In support of this stipulation, the parties request that the Court find the following:

1. By previous order, the Status Conference in this matter was continued to December 14, 2021 after this and defendant's related case (2:11-CR-00216) were reassigned to

- 1 the Honorable Judge John A. Mendez.
- 2 2. Counsel for the defendant was initially appointed on June 22, 2021, following two
- 3 prior CJA attorneys in this case. Since then, the government has represented that the
- 4 discovery associated with this case includes numerous reports and related
- 5 documents, photographs, audio recordings, and videos, and that all such discovery
- 6 has been either produced directly to counsel and/or made available for inspection
- 7 and copying.
- 8 3. At this time, counsel for defendant requires additional time to conduct investigation
- 9 and research related to the charges, review discovery for this matter, discuss
- 10 potential resolutions, and to otherwise prepare for trial.
- 11 4. The parties stipulate that the failure to grant the above-requested continuance would
- 12 deny defense counsel reasonable time necessary for effective preparation, taking
- 13 into account the exercise of due diligence.
- 14 5. For the purposes of calculating time under the Speedy Trial Act, 18 U.S.C. § 3161,
- 15 et seq., the parties agree and request that the time period from December 14, 2021
- 16 to January 18, 2022, inclusive, be excluded under 18 U.S.C. § 3161(h)(7)(A), B(iv)
- 17 [Local Code T4] upon such finding by the Court that the ends of justice served by
- 18 taking such action outweigh the best interest of the public and the defendant in a
- 19 speedy trial.

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21 IT IS SO STIPULATED.

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23 Dated: December 8, 2021

/s/ ETAN ZAITSU

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ETAN ZAITSU  
25 Counsel for Defendant  
26 REGINALD THOMAS  
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1 Dated: December 8, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

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4 /s/ DENISE YASINOW  
DENISE YASINOW  
Assistant United States Attorney

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11 **FINDINGS AND ORDER**

12 IT IS SO FOUND AND ORDERED this 8<sup>th</sup> day of December, 2021.

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14 /s/ John A. Mendez  
15 THE HONORABLE JOHN A. MENDEZ  
16 UNITED STATES DISTRICT COURT JUDGE  
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